

THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA	]	
	]	
v.	]	Cr. No. 19-cr-142-01-LM
	]	
NATHAN CRAIGUE	]	

**ASSENTED-TO MOTION TO CONTINUE TRIAL FOR 90 DAYS**

The defendant, Nathan Craigue, through his counsel, Dorothy E. Graham, AFD, files this motion respectfully requesting that the Court continue his trial, currently scheduled for September 17, 2019 for 90 days.

Grounds follow.

On July 10, 2019, Craigue was indicted for two counts of False Statement to a Federal Agent in violation of 18 U.S.C. § 1000. It is alleged that Craigue knowingly and willfully made material false statements to an OSHA Compliance Safety & Health Officer by stating that KM and CE were subcontractors and not employees.

Additional time is required to prepare for this case. The primary issue in dispute will be whether KM and CE met the legal definition of an employee versus that of an independent contractor – an area of law that may require consultation with an expert.

This is the first request for a continuance.

The government, through AUSA John Davis, assents.

Mr. Craigue is in agreement and waives his right to a speedy trial. A written waiver will be filed with the Court within ten days.

Wherefore the defendant respectfully moves the Court to grant this motion and to

continue the trial for 90 days, and for such other relief as may be deemed just.

Respectfully submitted,

Date: August 26, 2019

/s/ Dorothy E. Graham

Dorothy E. Graham

N.H. Bar No. 11292

Assistant Federal Defender

22 Bridge Street, 3<sup>rd</sup> floor

Concord, NH 03301

Tel. (603) 226-7360

E-mail: [Dorothy\\_Graham@fd.org](mailto:Dorothy_Graham@fd.org)

**CERTIFICATE OF SERVICE**

I hereby certify that the above document was served on the following person on August 26, 2019 and in the manner specified herein: electronically served through CM/ECF to AUSA John Davis.

/s/Dorothy E. Graham

Dorothy E. Graham